

FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 11, 1999

Mr. Benjamin L. Ginsberg, Esq. Patton Boggs, LLP 2550 M Street, NW Washington, DC 20037-1350

RE: MUR 4821

Dear Mr. Ginsberg:

On October 21, 1998, the Federal Election Commission notified your clients (See Attachment) of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against your clients. See attached narrative. Accordingly, the Commission closed its file in this matter on June 10, 1999.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact Jennifer H. Boyt on our toll-free telephone number, (800) 424-9530. Our local telephone number is (202) 694-1650.

Sincerely,

F. Andrew Turley / Supervisory Attorney

Central Enforcement Docket

Attachments
Narrative
List of Clients

MUR 4821	35. Garland, Charles	72. Modica Louis J.
Patton Boggs, LLP Client List	36. Gelfond, Linda R.	73. Moriarty, Michael
	37. Gelfond, Richard	74. Nagrodsky, George D.
1. Albicocco, Sam	38. Gerhart, James R.	75. Nicolia, Roberta L.
2. Alex. Alex C.	39. Gershowitz, Howard	76. Novogradac, Michael J.
3. Angelo, Craig	40. Gershowitz, Pamela	77. O'Rourke, John T.
4. Aries. Judith I	41. Gibbons, John P.	78. Parr, Ronald J.
5. Auerbach. Kenneth A.	42. Glass, Maureen	79. Peduzzi, Lawrence P.
6. Bahnik, Roger L.	43. Gray, Kirk L.	80. Peil, Arthur J.
7. Bell, Peter H.	44. Hartney, Kevin P.	81. Piccirillo, Anthony J., Trs
8. Bellas. Michael L.	45. Henein, Nagy	82. Podraza, Maria M.
9. Benjamin, Alvin	46. Herman, Jay M.	83. Procida, Frank
10. Bergassi, Edmund J.	47. Herz, Erik	84. Ranieri, Lewis S.
11. Berman, Donald M.	48. Hussey, Edward J.	85. Ranieri, Margaret D.
12. Bertuglia, Robert Jr.	49. Jordan, Rebecca E.	86. Rich, David C.
13. Boening, Harold J.	50. Jordan, Robert A.	87. Roach, Alfred J.
14. Borrelli, Laura J.	51. Jordon, Alexander S.	88. Roach, Timothy
15. Brayman, Cherly C.	52. Kanas, John A.	89. Rose, Frederick
16. Brayman, Rod	53. Kelly, Diane	90. Rose, Mark S.
17. Brayman-Gruber, Harriet	54. Kelly, Edward	91. Rose, Sally
18. Brito, Laura A.	55. Klein, Walter C. Jr.	92. Rosenberg, Stephen
19. Brito, Robert E.	56. Kluger, Laurie A.	93. Rosenfeld, Joan Patricia
20. Brooke. Paul J.	57. Kluger, Steven F.	94. Rosenfeld, Ronald
21. Brown, Dayton T.	58. Lazio for Congress	95. RSF Partners
22. Brown, Karin E.	59. Leonard, Charles	96. Runquist, Thomas R.
23. Broxmeyer, Mark	60. Leone, John	97. Rush, Adele
24. Carberry, John G.	61. Leone, Katherine	98. Russo, Peter J.
25. Conroy, Eugene F.	62. Levy, Jerome H.	99. Sacca, Michael J.
26. Corrado, John J.	63. Libert, Jack L.	100.Sammis, Quentin B.
27. Crowley, John J.	64. Madden, Brian	101.Santmann, Teresa M.
28. Curtin, Gerald J.	65. Madden, Elizabeth D.	102.Schiller, W. Roy
29. D'Addario, John Jr.	66. Maguire, James J.	103.Seaman, Gordon L., Jr.
30. Edson, Charles L.	67. McFerrin, Michael	104.Shah, Arvind R.
31. Filler, Arlington H.	68. McMillan, Robert R.	105.Siben, Andrew
32. Fitts, Catherine Austin	69. Mercurio, Pascal J.	106.Silverston, Sheldon
33. Ford, Eugene	70. Miller, Travis A.	107.Simons, Jim
34. Frisby, Gregory S.	71. Mills, Robert E.	108.Simons, Marilyn H.

110.Soloway, Richard L.

109.Smithers, Adele C.

115. Tortorelli, Janice E.

114.Thomas, James J.

16.Tortorelli, Peter B.

117. Traub, Lawrence 18. Valentine, Susan

13.Swanson, James H.

112.Stimmel, John 111.Spieker, Todd

23. Wallace, Michael J.

25. Wolfson, Zev W. 124. Weiner, Alan H.

121. Vitale, Margaret M.

120. Vitale, George

119. Vitale, Eric

122. Walker, Bettyann